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8	Attorneys for Ryan Hee		
9	United States Di	strict Court	
10	District of Nevada		
12	United States of America,	Case No. 2:21-cr-00098-RFB-BNW	
13	Plaintiff,		
14	v.	Stipulation to Continue Evidentiary	
15	Ryan Hee; and VDA OC, LLC,	Hearing	
16	Formerly Advantage On Call, LLC,	(First Request)	
17	Defendant.		
18			
19	IT IS HEREBY STIPULATED AND AGREED by and between Richard A. Wright		
20	and Sunethra Muralidhara, of Wright Marsh & Levy, counsel for Defendant Ryan Hee;		
21	Kathleen Bliss, Carole S. Rendon (Admitted <i>Pro Hac Vice</i>), and Mary Pat Brogan (Admitted		
22	Pro Hac Vice), counsel for Defendant VDA OC, LLC; and attorneys for the Department of		
23	Justice Antitrust Division, representing the United States of America, that the Evidentiary		
24	Hearing currently set for June 29, 2022 be continued for 30 days. The parties make this request for the following reasons:		
25	request for the following reasons.		
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1	1		

- 1. On March 30, 2021, the government filed an Indictment (ECF 1) against Mr. Hee and VDA OC, LLC charging both defendants with one count of Conspiracy in Restraint of Trade in violation of 15 U.S.C. § 1.
- On September 3, 2021, Defendant Hee filed a motion to dismiss or in the alternative to suppress, and Defendant VDA OC joined the motion. ECF 38, 40. This motion is fully briefed. ECF 44, 48, 50. The Court then set an evidentiary hearing on this matter for June 29, 2022. ECF 90.
- 3. The parties are currently in the process of negotiating this case and have reached a preliminary resolution as to both defendants that now needs to be confirmed in writing. The parties request additional time to prepare the necessary documents to finalize any agreements and review with each respective defendant.
- 4. Thus, the parties now request that the currently set evidentiary hearing be continued for no less than 30 days. Should the parties reach a signed written agreement for each defendant, the parties will notify the court and request that the evidentiary hearing be vacated, submit any signed agreements to the Court, and request appropriate hearing dates.

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1	5. This is the first request to cont	inue the evidentiary hearing. This request is not
2	made for purposes of delay.	The defendants are currently not detained and
3	agree to this continuance.	
4	Dated: June 24, 2022	Respectfully submitted,
5	By: /s/ Albert B. Sambat	By: <u>/s/ Carole S. Rendon</u>
6	Albert B. Sambat	Carole S. Rendon (pro hac vice)
7	Christopher J. Carlberg Mikal J. Condon	Jeffrey D. Martino (<i>pro hac vice</i>) Mary Pat Brogan (<i>pro hac vice</i>)
	Paradi Javandel	BAKER & HOSTETLER LLP
8	U.S. DEPARTMENT OF JUSTICE	127 Public Square, Suite 2000
9	ANTITRUST DIVISION	Cleveland, Ohio 44114
10	450 Golden Gate Avenue	Telephone: 216.621.0200
10	Box 36046, Room 10-0101	Facsimile: 216.696.0740
11	San Francisco, CA 941092 Telephone: 415.934.5300	<u>crendon@bakerlaw.com</u> <u>jmartino@bakerlaw.com</u>
12	Facsimile: 415.934.5399	mbrogan@bakerlaw.com
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13	christopher.carlberg@usdoj.gov	Kathleen Bliss
14	mikal.condon@usdoj.gov	KATHLEEN BLISS LAW PLLC
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		Attorneys for Defendant VDA OC, LLC
18		Dec /e/ Distance A Wais La
19		By: <u>/s/ Richard A. Wright</u> Richard A. Wright
		Sunethra Muralidhara
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		Attorneys for Defendant Ryan Hee
26		3

1	United States District Court District of Nevada		
2 3	United States of America,	Case No. 2:21-cr-00098-RFB-BNW	
4	Plaintiff, v.	[Proposed] Order	
5 6	Ryan Hee; and VDA OC, LLC, Formerly Advantage On Call, LLC,		
7 8	Defendant.		
9			
10	Based on the pending Stipulation and A	Agreement, and good cause appearing, the	
11	Evidentiary Hearing currently set for June 29, 2022 is hereby continued. The ends of justice		
12	are served by granting said continuance. The Court hereby ORDERS that the Evidentiary		
13	Hearing shall occur on August 10, 2022 at 10:00 AM. Any party to this matter may contact		
14	the Court requesting to vacate said hearing should the parties resolve this matter and request		
15	other appropriate hearing dates.		
16			
17	IT IS SO ORDERED:		
18	<u> </u>	June 24, 2022	
19	Hon. Richard F. Boulware, II United States District Judge	Date	
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